

# EXHIBIT I

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

PAUL HAARER,

*Plaintiff,*

v.

VINEYARD CAPITAL  
PARTNERS, L.L.C. and PINNACLE  
FUNERAL SERVICE, LLC,

*Defendants.*

CIVIL ACTION FILE

NO.: 2023CV378125

**JURY TRIAL DEMANDED**

**MOTION TO FILE UNREDACTED FIRST AMENDED COMPLAINT**  
**UNDER SEAL**

Pursuant to Uniform Superior Court Rule 21.6(D), Plaintiff Paul Haarer (“Plaintiff”) hereby respectfully submits his Motion to File Unredacted First Amended Complaint under Seal.

On June 20, 2023, Plaintiff filed a partially-redacted version of his First Amended Complaint for Damages and corresponding partially-redacted exhibits (the “Amended Complaint”). The redacted portions contain information that Defendants Vineyard Capital Partners, L.L.C. (“Vineyard”) and Pinnacle Funeral Service, LLC (“Pinnacle,” Pinnacle and Vineyard, collectively, the “Defendants”) may consider “Confidential Information” not to be publicized under Vineyard’s Operating Agreement and/or Employment Agreement. Accordingly, Plaintiff

requests that he be allowed to file the unredacted version of the Amended Complaint under seal.

This Motion is narrowly tailored to protect only that information that is possibly considered confidential by Defendants. Plaintiff seeks to avoid potential liability for publicly publishing the same. To that end, Plaintiff does not seek the Court's permission to seal all records, pleadings, or information presented in this action, but rather only certain information in the Amended Complaint and exhibits that Defendants may consider confidential. *See Savannah Coll. of Art & Design v. Sch. of Visual Arts, Inc.*, 270 Ga. 791, 792–93 (1999) (distinguishing filing certain information under seal as opposed to all pre-judgment records); (*see generally* Amended Complaint).

Further, this Court may allow filings to be placed under seal if the privacy of a party clearly outweighs the public interest in the pleadings. Unif. Super. Ct. R. 21.2; *Savannah College*, 270 Ga. at 792. Here, Plaintiff wishes to keep private only certain business information that Defendants may consider confidential.

A copy of the unredacted Amended Complaint (with exhibits) that Plaintiff requests to be filed under seal is being e-mailed to Judge McAfee's chambers for review, along with a copy of this Motion and a proposed order for the Court's convenience. The proposed order is attached hereto as **Exhibit A**.

Respectfully submitted, this 27th day of June 2023.

/s/ Richard L. Robbins

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*Counsel for Plaintiff*

# **EXHIBIT A**

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PAUL HAARER,

*Plaintiff,*

v.

VINEYARD CAPITAL PARTNERS,  
L.L.C. and PINNACLE FUNERAL  
SERVICE, LLC,

*Defendants.*

CIVIL ACTION FILE

NO.: 2023CV378125

**JURY TRIAL DEMANDED**

**[PROPOSED]**

**ORDER GRANTING MOTION TO FILE  
UNREDACTED FIRST AMENDED COMPLAINT UNDER SEAL**

This case comes before the Court on Plaintiff's Motion to File Unredacted First Amended Complaint Under Seal. Having reviewed the unredacted Amended Complaint and exhibits *in camera* as required under Georgia Uniform Superior Court Rule 21.6, the Motion is GRANTED. The unredacted version of the Complaint and exhibits shall be filed under seal.

**IT IS SO ORDERED**, this \_\_\_\_\_ day \_\_\_\_\_ 2023.

\_\_\_\_\_  
Honorable Judge McAfee  
Fulton County Superior Court  
Atlanta Judicial Circuit

**Submitted by:**

/s/ Richard L. Robbins

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the foregoing **Motion to File Unredacted First Amended Complaint Under Seal** using the Court's eFile system, which will automatically send electronic notice of such filing to all counsel of record. I have also emailed the aforementioned to Defendants' counsel.

Respectfully submitted, this 27th day of June 2023.

/s/ Richard L. Robbins  
Richard L. Robbins